

1 Christopher L. Lebsock (SBN 184546)  
2 Michael P. Lehmann (SBN 77152)  
3 Samuel Maida (SBN 333835)  
4 HAUSFELD LLP  
5 580 California Street  
6 12th Floor  
7 San Francisco, CA 94111  
8 Telephone: (415) 633-1908  
9 Facsimile: (415) 358-4980  
10 clebssock@hausfeld.com  
11 mlehmann@hausfeld.com  
12 smaida@hausfeld.com

Byung-Joo Lee (SBN 225384)  
JIHYANG LAW FIRM  
Seohee Tower, 7/F  
2583 Nambusunhwon-ro  
Seoul, Korea 06735  
Telephone: 82-2-3476-6002  
Facsimile: 82-2-3476-6607  
bjlee@jihyanglaw.com

8 YoungKi Rhee (*Pro Hac Vice forthcoming*)  
9 WE THE PEOPLE LAW GROUP  
10 Chinyang Building, 7/F  
11 47 Kyonggidae-ro, Seodaemun-gu  
12 Seoul, South Korea 03752  
13 Telephone: 82-2-2285-0062  
14 ykrhee@wethepeople.co.kr

13 *Additional Counsel Listed In Signature Block*

14  
15 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

16  
17 EPIC GAMES, INC.,  
18 Plaintiffs,  
19 v.  
20 APPLE, INC.,  
21 Defendant.

22 Case No. 4:20-cv-05640-YGR

23  
24 **ADMINISTRATIVE MOTION TO**  
**CONSIDER WHETHER CASES**  
**SHOULD BE RELATED PURSUANT**  
**TO CIVIL L.R. 3-12**

25 [Declaration and [Proposed] Order filed  
26 herewith]

27 JUDGE: Hon. Yvonne Gonzalez Rogers  
28 CTRM: 1-4th Floor

29 THIS DOCUMENT RELATES TO:

30  
31 *Korean Publishers Association, et al., v. Apple,*  
32 *Inc., No. 4:25-cv-4438-HSG*

1 **TO: THE COURT AND ALL OTHER PARTIES OF RECORD**

2 PLEASE TAKE NOTICE that Plaintiffs Korean Publishers Association, Korea Electronic  
 3 Publishing Association, Dan Scalise, PangSky Co., Ltd., and the putative class in the above-entitled  
 4 action (“Plaintiffs”) hereby move this Court to consider whether the following actions filed in the  
 5 United States District Court, Northern District of California should be related:

6 <u>Case Name</u>	7 <u>Case No.</u>	8 <u>Filing Date</u>
9 <i>Epic Games, Inc. v. Apple Inc.</i>	10     4:20-cv-5640	11     08/13/2020
12 <i>Korean Publishers Association, et al., v. Apple, Inc.</i>	13     4:25-cv-4438	14     05/23/2025

15 The above-listed actions involve the same transactions and events and the same legal issues.  
 16 It is therefore likely that there would be “unduly burdensome duplication of labor and expense” or  
 17 conflicting results if the cases are conducted before different Judges. *See Civil L.R. 3-12(a)(1) & (2).*  
 18 Relating the two cases and placing them under the supervision of one judge is likely to save the Court  
 19 and the parties significant costs and may facilitate and expedite the resolution of the cases.

20 **MEMORANDUM AND POINTS OF AUTHORITIES**

21 **I. THE TWO ACTIONS SHOULD BE RELATED**

22 Pursuant to Civil L.R. 3-12(a), actions are related when: “(1) [t]he actions concern  
 23 substantially the same parties, property, transaction or event; and (2) [i]t appears likely that there will  
 24 be an unduly burdensome duplication of labor and expense or conflicting results if the cases are  
 25 conducted before different Judges.” Here, these criteria are met.

26 Both of the above-listed actions allege violations of Section 2 of the Sherman, 15 U.S.C. § 2,  
 27 and California’s Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200, *et seq.*) (“UCL”).  
 28 Moreover, both of the above-listed actions are brought by app developers against Apple Inc. (“Apple”  
 or “Defendant”). Both concern Apple’s anticompetitive efforts to maintain supra competitive  
 commissions that it charges for transactions within its App Store.

29 Plaintiffs in *Korean Publishers Association* heavily rely on evidence from the *Epic v. Apple*  
 30 evidentiary hearings and both injunctions brought against Apple by this Court. It is therefore likely  
 31 that there will be “unduly burdensome duplication of labor and expense” or conflicting results if the  
 32 cases are litigated before different Judges. *See Civil L.R. 3-12(a)(1) & (2).* Relating the two cases and

1 placing them under the supervision of one judge will very likely save the Court and the parties  
 2 significant costs and may facilitate and expedite the cases.

3 **II. CONCLUSION**

4 For all of the reasons stated above, Plaintiffs hereby request that the Court in the lowest  
 5 numbered case, *Epic Games, Inc. v. Apple Inc.*, enter an Order relating the two cases listed above to  
 6 each other and reassigning the *Korean Publishers Association* action to Judge Yvonne Gonzalez  
 7 Rogers.

8

9

10 DATED: May 30, 2025

11

Respectfully submitted,

12

By: /s/ Christopher L. Lebsock  
 Christopher L. Lebsock (SBN 184546)  
 Michael P. Lehmann (SBN 77152)  
 Samuel Maida (SBN 333835)  
 HAUSFELD LLP  
 580 California Street, 12th Floor  
 San Francisco, CA 94111  
 Telephone: (415) 633-1908  
 Facsimile: (415) 358-4980  
 clebsock@hausfeld.com  
 mlehmann@hausfeld.com  
 smaida@hausfeld.com

13

*Counsel for Plaintiffs and the putative class*

14

Mindee J. Reuben (*Pro Hac Vice forthcoming*)  
 Katie R. Beran (*Pro Hac Vice forthcoming*)  
 HAUSFELD LLP  
 325 Chestnut Street, Unit 900  
 Philadelphia, PA 19106  
 Telephone: (215) 985-3270  
 Facsimile: (215) 985-3271  
 mreuben@hausfeld.com  
 kberan@hausfeld.com

15

*Counsel for Plaintiffs and the putative class*

16

YoungKi Rhee (*Pro Hac Vice  
forthcoming*)  
 WE THE PEOPLE LAW GROUP  
 Chinyang Building, 7/F  
 47 Kyonggidae-ro, Seodaemun-gu  
 Seoul, South Korea 03752  
 Telephone: 82-2-2285-0062  
 ykrhee@wethepeople.co.kr

*Counsel for PangSky and the putative class*

17

Byung-Joo Lee (SBN 225384)  
 JIHYANG LAW FIRM  
 Seohee Tower, 7/F  
 2583 Nambusunhwon-ro  
 Seoul, Korea 06735  
 Telephone: 82-2-3476-6002  
 Facsimile: 82-2-3476-6607  
 bjlee@jihyanglaw.com

*Counsel for KPA and KEPA and the  
putative class*

18

19

1 Scott Martin (*Pro Hac Vice forthcoming*)  
2 Zelly Rosa (*Pro Hac Vice forthcoming*)  
3 HAUSFELD LLP  
4 33 Whitehall Street, 14th Floor  
5 New York, NY 10004  
6 Tel: (646) 357-1100  
7 Fax: (212) 202-4322  
8 smartin@hausfeld.com  
9 zrosa@hausfeld.com

10  
11 *Counsel for Plaintiffs and the putative class*  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28